

EXHIBIT B

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RASIER, LLC; and RASIER-CA, LLC
17

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

22 IN RE: UBER TECHNOLOGIES, INC.,
23 PASSENGER SEXUAL ASSAULT
24 LITIGATION

25 This Document Relates to:

26 ALL ACTIONS

27 Case No. 3:23-md-03084-CRB

28 **DECLARATION OF GREG BROWN
SUPPORTING DEFENDANTS' MOTION
FOR SANCTIONS AGAINST BRET
STANLEY**

Judge: Hon. Lisa J. Cisneros
Courtroom: G-15th Floor

1 I, Greg Brown, declare under penalty of perjury as follows:

2 1. I am Director, Head of Central Safety at Uber Technologies Inc. (“Uber”), a Defendant
3 in the above captioned matter. Between 2014 and 2020, I was employed by Uber as “Operations and
4 Logistics Manager,” “Senior Operations Manager, Program Lead,” “Safety and Senior Program Lead,
5 Safety & Risk.” When I returned to Uber in 2022, I initially worked as Director of Safety, United
6 States & Canada. Since August 2024, I have served in my current Director role where my
7 responsibilities include overseeing, organizing, and implementing global risk programs.

8 2. I have personal knowledge of the statements set forth in this Declaration and could
9 competently testify to the same if called to do so.

10 3. I have reviewed UBER_JCCP_MDL_003941399, titled “INA-4142 | [REDACTED]
11 VFB Logistic Flow List to Audit” (“VFB Analysis”) and its metadata. The VFB Analysis was created
12 on May 5, 2023 and I understand was produced by Uber in this litigation from my custodial file on
13 March 28, 2025.

14 4. The VFB Analysis is a [REDACTED]
15 [REDACTED]
16 [REDACTED] he
17 VFB Analysis is central to developing Defendants’ proprietary method for identifying potential fraud
18 and unauthorized conduct on the Uber Eats platform;¹ and improving the safety of the Uber Eats
19 platform and by [REDACTED]. Defendants’ step-by-step
20 methodology for their proprietary analysis of this type of information—which is competitively
21 sensitive—is expressly set out in the VFB Analysis.

22 5. Access to the VFB Analysis was restricted within Uber by role and responsibility, and
23 is not broadly shared within the Uber organization. The details of the VFB Analysis are unknown to
24 Uber’s competitors and application users, and the disclosure of this information would result in a
25 competitive disadvantage to Uber and would also erode the efficacy of Uber’s audit process designed
26 to [REDACTED].

27 _____
28 ¹ The VFB Analysis does not relate to trips on the Uber Rideshare platform.

6. The VFB Analysis included the UUID of Joshua Aldana because it

The VFB Analysis does not indicate that Mr. Aldana was [REDACTED] Defendants have record of any [REDACTED] for Mr. Aldana.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 8, 2025.

Gregory Brown

Greg Brown, on behalf of Defendants